

Exhibit B

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

TIERRA EMERSON, et al

Case No. 2:22-cv-12576

Plaintiffs,

v.

Hon. Stephen J. Murphy, III

BLUE CROSS BLUE SHIELD OF
MICHIGAN, et al

Defendants.

**DEFENDANTS' FIRST SET OF INTERROGATORIES, REQUESTS FOR
ADMISSION, AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO PLAINTIFFS**

Consolidated Defendants Blue Cross Blue Shield of Michigan (“BCBSM”), LifeSecure Insurance Company, COBX Co., Accident Fund Insurance Company, Advantasure, Inc., Blue Care Network, d/b/a BCN, United Wisconsin Insurance Co., and Tessellate, LLC (“Defendants”), by and through their attorneys, Dickinson Wright PLLC, and pursuant to the Stipulation and Order Regarding Consolidation and Related Matters (ECF No. 29), submit the following First Set of Interrogatories, Requests for Admission, and Requests for Production of Documents to the Consolidated Plaintiffs:

DEFINITIONS AND INSTRUCTIONS

DEFINITIONS

A. “Plaintiff” means each of the Consolidated Plaintiffs, which includes Salvatore Biondo, Jacquelyn Bradley, Jamie Burzan, Chris Casciano, Indeiria Clark, Michael Daubenmeyer, Cheryl Dean, Angela Dickhudt, Ranjeet Escamilla, Elizabeth Francis, Lisa Frizzell, Gina Galli, Jeff Garczynski, Khaneisha Gardner, Gina Guerra, Christie Hayman, Scott Holley, Matthew Vaughn Housepian, Charita Kelly, Abigail Langerak, Juana Lowe, Najean Lucky, Carmen Peeples, Brooke Pung, Rachel Riesing, Nina Riley, Ryan Romano, Crystal Sesi, Allyson Silverthorn, Renee Stallworth, Nichole Stevens, Shannon Wojtowicz, Chris Adams, Michele Anderson, Latoya Armstrong, Noor Atisha, Renee Bacon, Anastasia Bakhareva, Carmella Baldino, Kitty Beard, Theresa Behling, Christina Bloch, Denzell Blockett, Christina Bloom, Shantal Blythe, Samantha Browe, Joshua Brown, Laura Chevrette, Karena Clark, Toyoka Collins, Ingrid Darga, Lisa Dayble, Catherine Delbrugge, Kelly DeLeeuw, Klaudia Dell, Tammy Dial, Lisa Donski, LaJuana Dorsey, Nicholas Dreshaj, Rachel Drouillard, Michael Ehred, Christina Estes, Sherry Ford, La’Keisha Franklin, Nadine Garcia, Penny Garza, Faye Geroche, Tracy Glass, Dorian Gray, Suhey Groulx, Tina Gueccia, Jennifer Gundel, Veronica Habbo, Rebecca Harris, Dawn Harvey, Renee Helppie-Chase, Christanna Hemmingway, Margaret Hodson, Kathryn Johnson, Ghada Joseph,

Dana Kennedy, Valerie Kleinheksel, Denise Kolen, Jody Kovich, Keri Kublnick, Lisa Lagocki, Amber Lewis, Audrey Lidtke, Kristy Loomis, Kilian MacKay, Camalia Mann, Brenda Manni, Aaron Manzella, Cindy Masserman, Amy Matt, Payton Matzinger, Heather McDonald, Stephanie McGuire, Amy McKolay, Todd Merz, Breana Miles, Lisa Mitchell, Nathan Morales, Tanya Morgan, Akeya Muhammad, Chelsea Murray, Tress Nafsu, Jason Partin, Angelene Polk, Ceneca Pratt, Nathan Repke, Denise Roberson, Laura Rucker, Richard Michael Rupert, Paula Rutter, Cindy Schroeder, Michelle Sherry, Julie Sibel, Karen Skender, Jasmine Smith, Kaytlyn Smith, Kennesha Smith, Sabrina Smith, Melodie Snipes, Michelle Sobczynski, Anyssa Spencer, Kathy Swartz, Stacey Wayland, Paul Whibley, Shannon Williams, Todd Woodburn, Greg Zdyrski, and Neviana Zemblaku, as well as each Plaintiff's agents, representatives, attorneys, and all other persons acting on each Plaintiff's behalf or interest.

B. "Defendant" means each of the Consolidated Defendants Blue Cross Blue Shield of Michigan ("BCBSM"), LifeSecure Insurance Company, COBX Co., Accident Fund Insurance Company, Advantasure, Inc., Blue Care Network, d/b/a BCN, United Wisconsin Insurance Co., and Tessellate, LLC.

C. "Person" or "party" includes any individual, corporation, partnership, group, association, union, fraternity, company, sole proprietor, establishment, firm,

co-partnership, joint venture, government, governmental department, governmental agency, or any other organization or entity.

D. The terms “and/or,” “and,” and “or” shall be interpreted both conjunctively and disjunctively so as not to exclude any information otherwise within the scope of any discovery request. The term “any” means “all” and/or “each” and vice versa, as necessary to bring within the scope of the discovery request all information that might otherwise be construed to be outside of its scope. The singular shall include the plural and vice versa, as necessary to bring within the scope of the discovery request all information that might otherwise be construed to be outside of its scope.

E. The term “communication(s)” means the act or fact of communication between or among any persons, including, but not limited to: face-to-face communications, text messages, telephone conversations, letters, memoranda, notes, summaries, photographs, audiotapes, videotapes, electronic or computer mail or messages, or other materials or memorials of communications, meetings, or any occasion of joint or mutual presence, as well as the transfer of any document or writing from one person to another.

F. The word “document” shall have its customary broad meaning and shall include, without limitation, the following items, whether printed, recorded or reproduced by any other mechanical process, or written or produced by hand, and

whether or not claimed to be privileged against discovery on any grounds: agreements; communications; notes; correspondence; letters; memoranda; emails; text messages; iMessages; direct messages; social media posts, comments on posts, tweets, responses to tweets, and articles shared; notebooks; summaries or records of telephone conversations; summaries or records of personal conversations or interviews; diaries; statistical statements; graphs; laboratory reports and notebooks; manuals; specifications; instructions; charts; plans; drawings; expressions or statements; lists of persons attending meetings or conferences; reports and/or summaries of investigations; opinions or reports of consultants; opinions of counsel; records; reports or summaries of negotiations; photographs; brochures; pamphlets; advertisements; circulars; drafts of any documents; original or preliminary notes; marginal comments appearing on any document; stenographic or stenotype notes; any voice recording in any format; computer data, including emails and information contained on phones, iPhones, iPads, or similar devices; computer printouts; financial statements; projections; loan applications; bids; letters of interest; computer programs; financial models; and pricing methodologies.

G. The terms “relating to” and “related to” mean in any way concerning, constituting, comprising, containing, setting forth, summarizing, reflecting, stating, describing, recording, noting, embodying, mentioning, studying, analyzing,

evaluating, discussing, contemplating, commenting upon, or referencing a specified subject directly or indirectly.

H. “Defendant’s Vaccine Policy” or “the Vaccine Policy” means the mandatory COVID-19 vaccination policy announced and implemented by each Defendant in October of 2021, which required that employees become vaccinated against COVID-19 by January 4, 2022, or have an approved medical or religious accommodation by that date.

INSTRUCTIONS

A. The information sought in the form of Interrogatories must be given under oath, whether it is secured by Plaintiff, Plaintiff’s agents, representatives or attorneys, or any other persons who have made this knowledge known to Plaintiff or from whom Plaintiff can get this information and who is competent to testify to the facts stated. Pursuant to the Stipulation and Order Regarding Consolidation and Related Matters (ECF No. 29), written responses to these discovery requests are due by November 30, 2023, and each Plaintiff shall make best efforts to complete Plaintiff’s production of documents by January 31, 2024.

B. Where requested to “identify” an individual, provide his or her full and correct name, present or last known employer and position, present or last known business address, and present or last known residential address.

C. In answering these discovery requests, furnish all information available, including all information that can be obtained from each Plaintiff's present and former agents, representatives, attorneys, and any other person who has acted on said Plaintiff's behalf or in their interest, and from any other source available to said Plaintiff.

D. In answering these discovery requests, omit no information or details. We will assume that where information is not stated it does not exist, and that where detail is missing, it cannot be provided. We will request a ruling that any information or detail not furnished in these answers or in supplemental answers cannot thereafter be used by Plaintiffs in this matter as evidence or otherwise.

E. If any given Plaintiff cannot answer any discovery request in full, answer it as completely as possible and describe in detail all the reasons for said Plaintiff's inability or failure to answer completely.

F. If any given Plaintiff refuses to supply any information or document because of a claim of confidentiality, privilege, or any other protection from disclosure, answer the remainder of the interrogatory or request, state the basis of said Plaintiff's claim of protection, and identify the information or document as fully as possible without destroying the asserted protection from disclosure.

G. These discovery requests are continuing in nature and demand is hereby made that any further or different information or answers not available at

the time of the response to this discovery and which later become known to any given Plaintiff, their attorneys or agents, directly or indirectly, shall forthwith be provided under oath, and the discovery requests answered fully and completely at the time such information or answers become available to said Plaintiff.

INTERROGATORIES

1. For each Plaintiff, state said Plaintiff's complete name, address, social security number, and date of birth.

ANSWER:

2. For each Plaintiff, state said Plaintiff's complete name, username, handle, and all other account identifier information associated with all of said Plaintiff's social media accounts, including, but not limited to, Facebook, Instagram, Twitter, Tumblr, Pinterest, Reddit, Tribel, and LinkedIn.

ANSWER:

3. For each Plaintiff, state the name, address, and telephone number of all companies, entities, and the like with whom said Plaintiff has contacted, completed an application for employment, or to whom said Plaintiff has submitted a resume ("Contact") from January 1, 2021, through and including the present and continuing until the date of trial of this action and describe the result of the Contact.

ANSWER:

4. For each Plaintiff, list each and every website or other publication said Plaintiff has consulted in an effort to find employment since said Plaintiff's last day worked at any Defendant, through and including the present and continuing until the date of trial of this action and for each such publication identify: the name of the website/publication; the date(s) upon which it was consulted; the name, address, and telephone number of each company or entity contacted as a result; and describe the result of the Contact.

ANSWER:

5. For each Plaintiff, since said Plaintiff's last day worked at any Defendant, state: all sources of income by name and address; how long this income has been received and how long it will be received in the future; the monthly amount of said income, past, present, and future; the basis upon which said Plaintiff receives these monies, past, present, and future; and produce all documents supporting the above answers.

ANSWER:

6. For each Plaintiff, please list all doctors, personal physicians, and other healthcare professionals said Plaintiff has visited or treated within the last 5 years. For each, please identify: the name of the health care professional, organization, or treatment facility; the address of the health care professional, organization, or treatment facility; the dates upon which treatment or counseling was sought and/or received; the duration and frequency of the treatment or counseling; and execute the attached records releases for each health care professional, organization, or treatment facility identified above.

ANSWER:

7. For each Plaintiff, identify whether and when said Plaintiff has ever received any vaccine, as well as the type of vaccine (e.g., COVID, Flu, etc.) and who administered the vaccine (e.g., pharmacy).

ANSWER:

8. For each Plaintiff, identify whether and when said Plaintiff has ever tested positive for COVID-19.

ANSWER:

9. State the name, address, employer, position, and telephone number of every person whom any Plaintiff is aware of having knowledge of any of the facts asserted in the Plaintiff's Complaint or Amended Complaint and: state in detail the nature of the information each such person has regarding those facts; and state whether said Plaintiff is aware of any document each such individual has regarding his or her knowledge of those facts.

ANSWER:

10. State the name, address, employer, position, and telephone number of each witness whom any Plaintiff may call at the trial of this case. For each individual identified: state the subject matter on which each such person is expected to testify; list in detail the testimony each such person is expected to give regarding each subject matter on which he/she is expected to testify; attach a list of

each document, exhibit or visual aid which will be offered in connection with the testimony of each such witness; and state whether any Plaintiff has a written statement from each such person relating to anticipated testimony or any fact in issue in this litigation.

ANSWER:

11. Is there any person that any Plaintiff has consulted with or intends or expects to consult with or whom any Plaintiff intends to or expects to call as an expert witness at the time of trial of this action? If yes, as to each such expert witness, please state: his/her name, address, and phone number; a summary of his/her qualifications, including educational background; the opinion or opinions the expert will give in consultation or at the time of trial; the specific facts and grounds upon which the expert bases his/her opinion or opinions; each and every document, and exhibit or visual aid intended to be used in conjunction with or offer into evidence through each expert witness.

ANSWER:

12. For each Plaintiff, please explain the reason(s) why said Plaintiff sought an exemption from, and/or accommodation relative to the Vaccine Policy.

ANSWER:

13. Please list each and every exhibit, document, or visual aid which any Plaintiff intends to use at the trial of any Plaintiff's case and identify the witness through whom each exhibit will be introduced.

ANSWER:

14. For each Plaintiff, with respect to each allegation of claimed damages, including, but not limited to, economic, compensatory, punitive, exemplary, or emotional, state the nature of or basis for every type of damages claimed and separately for each type provide the following information: the precise amount of damages claimed; the means by which said amount was derived, including formulas used, dates or periods of time over which amounts were calculated, expenses incurred, etc.; the means by which said Plaintiff intends at trial to establish the type and amount of claimed damages; the identity (name, address,

telephone number, current employer, and relation to said Plaintiff) of each person believed or alleged to have been involved on behalf of any Defendant in causing said type and amount of claimed damages and the nature of said involvement; and the nature, date, author, addressee, and subject matter of each document or tangible thing said Plaintiff relies upon in support of said type and amount of claimed damages or which said Plaintiff intends to or may introduce at trial in this case.

ANSWER:

15. For each Plaintiff whose Answer to Request for Admission No. 3 is “Admitted” or “Yes,” identify which over-the-counter medications said Plaintiff has taken since January 1, 2018.

ANSWER:

REQUESTS FOR ADMISSION

1. For each Plaintiff, admit that said Plaintiff has received at least one vaccine during said Plaintiff's lifetime.

ANSWER:

2. For each Plaintiff, admit that said Plaintiff has received at least one COVID-19 vaccine (or a COVID-19 booster shot) during said Plaintiff's lifetime.

ANSWER:

3. For each Plaintiff, admit that said Plaintiff has taken Tylenol, Ibuprofen, or other over-the-counter medications since January 1, 2018.

ANSWER:

DOCUMENTS TO BE PRODUCED

1. For each Plaintiff, any and all documents, communications, records, or papers that in any way relate to said Plaintiff's employment at any Defendant, including all documents relied upon, consulted, or used to support each claim and

allegation contained in said Plaintiff's Complaint or Amended Complaint and all documents that said Plaintiff believes in any way support or relate to any claim or allegation contained in the Complaint or Amended Complaint.

RESPONSE:

2. For each Plaintiff, all documents, communications, records, or papers that said Plaintiff provided to any Defendant related to said Plaintiff's request(s) for exemption and/or accommodation from the Vaccine Policy.

RESPONSE:

3. For each Plaintiff, any and all documents, communications, records, or papers that in any way reflect, demonstrate, prove, support, or relate to the sincerely held religious and/or spiritual belief(s) for which (or based upon which) said Plaintiff requested exemption and/or accommodation from the Vaccine Policy, including, but not limited to, religious and/or spiritual texts/emails, treatises, publications, writings, statements of dogma or doctrine, or other similar documents.

RESPONSE:

4. For each Plaintiff, any and all documents, communications, records, or papers that in any way reflect, demonstrate, prove, support, or relate to the medical condition(s) for which (or based upon which) said Plaintiff requested exemption and/or accommodation from the Vaccine Policy, including, but not limited to, medical records, diagnoses, treatment records, prescriptions, test results, or other similar documents.

RESPONSE:

5. For each Plaintiff, all communications of any kind in any medium or format, including, but not limited to, emails, texts, iMessages, direct messages, posts, comments on posts, tweets, comments on tweets, shares, and likes on social media websites or applications (e.g., Facebook, Instagram, Twitter, Tumblr, Pinterest, Reddit, Tribel, LinkedIn) between said Plaintiff and any person, related to COVID-19 and from March 2020 to present.

RESPONSE:

6. For each Plaintiff, all communications of any kind in any medium or format, including, but not limited to, emails, texts, iMessages, direct messages, posts, comments on posts, tweets, comments on tweets, shares, and likes on social media websites or applications (e.g., Facebook, Instagram, Twitter, Tumblr, Pinterest, Reddit, Tribel, LinkedIn) between said Plaintiff and any person, related to employers mandating COVID-19 vaccination and from December 2020 to present.

RESPONSE:

7. For each Plaintiff, all communications of any kind in any medium or format, including, but not limited to, emails, texts, iMessages, direct messages, posts, comments on posts, tweets, comments on tweets, shares, and likes on social media websites or applications (e.g., Facebook, Instagram, Twitter, Tumblr, Pinterest, Reddit, Tribel, LinkedIn) between said Plaintiff and any person, related to the Vaccine Policy.

RESPONSE:

8. For each Plaintiff, all social media (Facebook, Instagram, Twitter, Tumblr, Pinterest, Reddit, Tribel, LinkedIn, and other similar social networking websites or applications) posts, pictures, blogs, stories, comments, shares, tweets, links, likes, or other content that said Plaintiff posted, authored, created, shared, or maintained, related to vaccines, religion, and/or said Plaintiff's health, from January 1, 2017 to present.

RESPONSE:

9. For each Plaintiff, all social media (Facebook, Instagram, Twitter, Tumblr, Pinterest, Reddit, Tribel, LinkedIn, and other similar social networking websites or applications) posts, pictures, blogs, stories, comments, shares, tweets, links, likes, or other content that said Plaintiff posted, authored, created, shared, or maintained, related to COVID-19, from March 2020 to present.

RESPONSE:

10. For each Plaintiff, all social media (Facebook, Instagram, Twitter, Tumblr, Pinterest, Reddit, Tribel, LinkedIn, and other similar social networking websites or applications) posts, pictures, blogs, stories, comments, shares, tweets,

links, likes, or other content that said Plaintiff posted, authored, created, shared, or maintained, related to employers mandating vaccines, from January 1, 2017 to present.

RESPONSE:

11. For each Plaintiff, all social media (Facebook, Instagram, Twitter, Tumblr, Pinterest, Reddit, Tribel, LinkedIn, and other similar social networking websites or applications) posts, pictures, blogs, stories, comments, shares, tweets, links, likes, or other content that said Plaintiff posted, authored, created, shared, or maintained, related to employers mandating COVID-19 vaccines, from December 2020 to present.

RESPONSE:

12. For each Plaintiff, all social media (Facebook, Instagram, Twitter, Tumblr, Pinterest, Reddit, Tribel, LinkedIn, and other similar social networking websites or applications) posts, pictures, blogs, stories, comments, shares, tweets, links, likes, or other content that said Plaintiff posted, authored, created, shared, or maintained, related to any Defendant's Vaccine Policy.

RESPONSE:

13. For each Plaintiff, all communications of any kind in any medium or format, including, but not limited to, emails, texts, iMessages, direct messages, posts, comments on posts, tweets, comments on tweets, shares, and likes on social media websites or applications (e.g., Facebook, Instagram, Twitter, Tumblr, Pinterest, Reddit, Tribel, LinkedIn) between said Plaintiff and any current or former spiritual and/or religious leader(s), including, but not limited to, imams, priests, rabbis, deacons, elders, pastors, preachers, and ministers, related to vaccines from January 1, 2017 to present.

RESPONSE:

14. For each Plaintiff, all communications of any kind in any medium or format, including, but not limited to, emails, texts, iMessages, direct messages, posts, comments on posts, tweets, comments on tweets, shares, and likes on social media websites or applications (e.g., Facebook, Instagram, Twitter, Tumblr, Pinterest, Reddit, Tribel, LinkedIn) between said Plaintiff and any current or former spiritual and/or religious leader(s), including, but not limited to, imams,

priests, rabbis, deacons, elders, pastors, preachers, and ministers, related to COVID-19 vaccines from December 2020 to present.

RESPONSE:

15. For each Plaintiff, all studies, records, articles, publications, or other documents dated March 2020 to December 2021 related to the transmissibility, contagion, virulence, community spread, or prevalence of COVID-19, that said Plaintiff reviewed and/or relied upon and that relate to said Plaintiff's claims in their case.

RESPONSE:

16. For each Plaintiff, all studies, records, articles, publications, or other documents related to COVID-19 vaccines, that said Plaintiff reviewed and/or relied upon before January 2022, and that support said Plaintiff's claims in their case.

RESPONSE:

17. For each Plaintiff, any and all notes, including personal notes and diaries, memoranda, and any other writings prepared by or in said Plaintiff's possession relating to, or in any way referring to, any interviews, meetings, telephone calls, or other communications between said Plaintiff and any person (including any Defendant and its current or former agents, independent contractors, or employees), from 2020 to the present, regarding said Plaintiff's current or past employment.

RESPONSE:

18. Produce all documents, including, but not limited to, applications, resumes, and cover letters each Plaintiff has submitted to potential employers or contractors for the purposes of obtaining employment since said Plaintiff's last day worked at any Defendant, through and including the present.

RESPONSE:

19. Produce all responses each Plaintiff has received from potential employers or contractors since said Plaintiff's last day worked at any Defendant, through and including the present.

RESPONSE:

20. Produce any and all documents or correspondence relating to all charges each Plaintiff has filed with the Equal Employment Opportunity Commission, the National Labor Relations Board, the IRS, the United States Department of Labor, or similar state agencies in connection with said Plaintiff's work at any Defendant.

RESPONSE:

21. Produce all federal, state or local tax returns filed by each Plaintiff or on their behalf, including, without limitation, all W-2s, 1040s, and all schedules or attachments thereto, for the years 2017 through and including the present.

RESPONSE:

22. Produce all W-2s, 1099s, and all other payroll records related to work performed by each Plaintiff, for the years 2021 through and including the present.

RESPONSE:

23. Produce a copy of each and every document acquired, developed, reviewed, or relied upon by the experts identified by any Plaintiff, in anticipation of this litigation and/or in anticipation of the trial of this action.

RESPONSE:

24. Produce a copy of the CV of any expert identified by any Plaintiff.

RESPONSE:

25. For each Plaintiff, please fill out and execute the attached authorizations.

RESPONSE:

/s/ Brandon C. Hubbard

Scott R. Knapp (P61041)

Brandon C. Hubbard (P71085)

Maureen J. Moody (P85032)

Grant W. Hohlbein (P86319)

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Attorneys for Defendants

Dated: August 31, 2023

**HIPAA Privacy Authorization
for Disclosure of Protected Health Information
Relevant to Litigation, Pending Claims or Intent to Sue**

Patient's Name: _____
Address: _____ Date of Birth _____

1. I make this Authorization for the purpose of copying records in connection with a lawsuit or claim to which I am a party.
2. This authorization is directed to and applies to protected health information maintained by (hospital, physician, medical provider, etc.):

3. I hereby authorize the above, its director, administrative and clinical staff or assignees, medical information services and billing departments to release any and all medical records and information from my date of birth to the present unless specified otherwise, relating to my care and treatment including x-rays, photographs, electronic and digital files and any other records, unless I expressly direct or specify otherwise. I understand that medical information may include records, if any, relating to treatment for alcohol and drug abuse protected under the regulations in 42 C.F.R. Part 2; psychiatric/psychological services and social work records and any information regarding communicable diseases and infections, defined by Michigan Department of Public Health rule, which can include tuberculosis, venereal diseases, sexually transmitted diseases, acquired immunodeficiency syndrome (AIDS), human immunodeficiency virus (HIV) or ARC.

4. This information is to be released for copying purposes to **DICKINSON WRIGHT PLLC** or their agent, **RECORD COPYING SERVICES**.

5. I understand that information used or disclosure pursuant to this authorization may be disclosed by the recipient and may no longer be protected by the Federal Privacy Rules.

6. This authorization shall be in force and in effect until the conclusion of the pending litigation or claim unless otherwise specified.

7. I understand that I have the right to revoke this authorization at any time. I understand that if I revoke this authorization I must do so in writing and send it to the hospital, doctor, or other custodian of medical information. I understand that the revocation will not apply to information that has already been released in response to this authorization.

8. I understand that authorizing the release of this health information is voluntary and that I need not sign this form in order to ensure health care treatment, eligibility for benefits, payment of health plan enrollment.

9. A copy of this authorization is as valid as the original.

All pertinent sections of this form must be completed before signing.

Subscribed and sworn to before me
on _____, 2023

X _____
Signature of Patient or Legal Representative

Notary

County, MI

Print Name of Patient or Legal Representative

My commission expires: _____
Description of Legal Representative's Authority or Relationship

**AUTHORIZATION FOR RELEASE OF
EMPLOYMENT RECORDS AND INFORMATION**

TO:

This will authorize and request you to permit any representative of the law firm of Dickinson Wright PLLC to examine any and all of your records relating to employment of _____, including payroll records, personnel records, pre-employment applications, records regarding physical examinations and/or drug tests, performance appraisals, W-2s, benefit enrollment applications, insurance policies, and any further information which may be available to you, and to discuss the same with you.

You are further authorized to provide any representative of Dickinson Wright PLLC with a copy of any and all such records and materials.

A photostatic copy of this authorization shall be considered as effective and valid as the original.

Last Four Digits Of SSN: _____

Date of Birth: _____

Subscribed and sworn to before me
this ____ day of _____, 2023.

NOTARY PUBLIC
County of _____, Michigan
My commission expires: _____

**AUTHORIZATION FOR RELEASE OF
STATE OF MICHIGAN INCOME TAX RETURNS**

TO: STATE OF MICHIGAN -
TREASURY DEPARTMENT

This will authorize and request you to permit any representative of the law firm of Dickinson Wright PLLC to examine any and all of your records relating to the State of Michigan income tax returns filed by _____ for the past five years, including all W2s and schedules attached to said tax returns, and any further information which may be available to you, and to discuss the same with you.

You are further authorized to provide any representative of Dickinson Wright PLLC with a copy of any and all such records and materials.

A photostatic copy of this authorization shall be considered as effective and valid as the original.

Last Four Digits Of SSN: _____

Date of Birth: _____

Subscribed and sworn to before me
this ____ day of _____, 2023.

NOTARY PUBLIC
County of _____, Michigan
My commission expires: _____

PROOF OF SERVICE

The undersigned certifies that on August 31, 2023, the foregoing *Defendants' First Set of Interrogatories, Requests for Admission, and Requests for Production of Documents to Plaintiffs* was served upon all parties to the above case to each of the attorneys of record herein at their respective addresses as disclosed on the pleading, via:

- | | |
|--|---|
| <input type="checkbox"/> Mail | <input type="checkbox"/> Fax |
| <input type="checkbox"/> Hand Delivery | <input type="checkbox"/> Overnight Courier |
| <input type="checkbox"/> Federal Express | <input checked="" type="checkbox"/> Other: <i>Email</i> |

I declare under penalty of perjury that the statement above is true to the best of my information, knowledge and belief.

Signature: /s/ Angelina R. Delmastro